

## OFFICE OF THE DISTRICT ATTORNEY RICHMOND COUNTY

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With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure: in a discussion with Detective Kristen White on December 5, 2014, during trial preparation on an unrelated case, the detective indicated that during the time she has been employed by the New York City Police Department, she believed that she had been named as a defendant or co-defendant in a federal civil lawsuit in 2011-2012 that involved the use of excessive force. However, because her involvement in the lawsuit was limited to only receiving notice of the claim from the Law Department of the City of New York, Det. White recalled little about either the status of the lawsuit, or the specific allegations contained in complaint, other than it was an excessive force claim. In this discussion, Det. White indicated that she had not been deposed in any civil lawsuit, nor had she given trial testimony in a civil lawsuit.

As a result of the past conversation with Det. White, on August 18, 2015, the People performed a simple name search of the Public Access to Court Electronic Records ["PACER"] website, and found the following cases which list "Kristen White" as a civil defendant together with the "City of New York" in cases in the Eastern or Southern Districts of New York:

 Lauricella v. City of New York, 12 CV 3015 (NRB) - settled in 2013 for an undisclosed amount, with stipulation of settlement filed ending litigation in Southern District of New York;